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7

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA
10

11 ***

12 LAS VEGAS DEVELOPMENT GROUP, LLC,)
a Nevada limited liability company,)
13 Plaintiff,)
14 vs.)
15 STEVEN P. SCHNEIDER, an individual;)
NATIONSTAR MORTGAGE, LLC, a)
16 Delaware limited liability company; AZTEC)
FORECLOSURE CORPORATION, a)
17 California corporation; TRACY BURR, an)
individual; FEDERAL NATIONAL)
18 MORTGAGE ASSOCIATION, a federally)
chartered corporation; EVERGREEN)
19 MONEYSOURCE MORTGAGE COMPANY,)
a Washington corporation; DOE individuals I)
20 through XX; and ROE CORPORATIONS I)
through XX,)
21 Defendants.)
22

Case No. 2:16-cv-00038-RFB-GWF

23 **STIPULATION TO EXTEND TIME TO RESPOND TO MOTION**
24 **FOR ENTRY OF FINAL JUDGMENT PURSUANT TO NRCP 54(B)**
AND MOTION FOR ATTORNEYS' FEES
25 **(Fourth Request)**

26 COMES NOW Plaintiff, LAS VEGAS DEVELOPMENT GROUP, LLC ("*LVDG*"), and
27 Defendant, AZTEC FORECLOSURE CORPORATION ("*Aztec*"), by and through their
28 undersigned counsel, and hereby stipulate and agree as follows:

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1. On January 5, 2016, prior to the date on which this matter was removed to this Court, Aztec filed a Motion for Entry of Final Judgment Pursuant to NRCP 54(b) related to an Order granting Aztec's Motion to Dismiss in the State Court. Said Motion is attached to the Joint Status Report filed herein on February 11, 2016 [Doc. #20-1].
2. On January 15, 2016, Aztec filed a Motion for Attorneys' Fees and Costs herein [Doc. #7].
3. On January 21, 2016, the parties submitted a Stipulation [Doc. #10] extending the time in which to respond to the subject Motions because they were discussing the potential amicable resolution of said Motions. The Court granted this Stipulation on February 9, 2016 [Doc. #16].
4. On February 5, 2016, the parties submitted a second Stipulation [Doc. #14] extending the time in which to respond to the subject Motions because they continued to discuss the amicable resolution of said Motions. The Court granted this Stipulation on February 9, 2016 [Doc. #17].
5. On February 19, 2016, the parties submitted a third Stipulation [Doc. #26] extending the time in which to respond to the subject Motions because they continued to discuss an amicable resolution. The Court granted this Stipulation on March 1, 2016 [Doc. #28].
6. The parties have agreed upon an amicable resolution of the Motions. Settlement documents have been drafted which are presently being reviewed by a representative of Aztec. Various levels of authority must approve the settlement terms because of the multiple facets, including addressing the fees and costs claimed, Rule 54(b) certification and imminent appeal if no resolution is reached.
7. The parties expect to execute appropriate settlement documents; Aztec expects to file withdrawals of the subject Motions; and the parties expect to submit an appropriate stipulation resolving the motions, on or before March 28, 2016. At that time, the subject Motions will be fully resolved without the need for further

1 action by the Court other than the review and approval of any stipulation that is
2 submitted.

3 8. In the event of an unforeseen circumstance requiring a response to the Motions,
4 LVDG shall have an additional period of time until and including March 28,
5 2016, in which to file Responses to the pending Motions and Aztec shall have
6 until April 11, 2016.

7 9. This Stipulation is made in good faith and not for purpose of delay.

8 Dated this 11th day of March, 2016.

9 ROGER P. CROTEAU &
10 ASSOCIATES, LTD.

WRIGHT, FINLAY & ZAK, LLP

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Aztec Foreclosure Corporation

IT IS SO ORDERED.



RICHARD F. BOULWARE, II
United States District Judge

DATED this 21st day of March, 2016.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 11th day of March, 2016, I served via the United States District Court CM/ECF electronic filing system, the foregoing **STIPULATION TO EXTEND TIME TO RESPOND TO MOTION FOR ENTRY OF FINAL JUDGMENT PURSUANT TO NRCP 54(B) AND MOTION FOR ATTORNEYS' FEES (Fourth Request)** to the following parties:

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